

**MC ELROY, DEUTSCH, MULVANEY & CARPENTER, LLP**  
ATTORNEYS AT LAW

1300 MOUNT KEMBLE AVENUE  
P.O. BOX 2075  
MORRISTOWN, NEW JERSEY 07962-2075  
(973) 993-8100  
FACSIMILE (973) 425-0161

CRAIG J. COMPOLI, JR.  
Direct dial: (973) 425-8687  
ccompoli@mdmc-law.com

February 1, 2017

**VIA ELECTRONIC FILING**

Honorable James B. Clark, III  
United States Magistrate Judge  
United States District Court, District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street, Court Room PO 01  
Newark, New Jersey 07101-0999

**Re: Jeffrey A. Winters and Collection Solutions, Inc., on their own behalf and on behalf of all others similarly situated v. Joseph K. Jones, Esq., et al.**  
**Civil Action No. 2:16-cv-09020-JMV-JBC**  
**MDMC File No. C1347-1265**

Dear Judge Clark:

This firm represents defendants, Laura S. Mann, Esq. and The Law Offices of Laura S. Mann, LLC, in the above matter. Kindly accept this brief correspondence in reply to a letter written by plaintiffs' counsel dated January 30, 2017. We respectfully object to the relief sought in counsel's correspondence.

As with the two other law firms that opposed the relief counsel now seeks, this firm objects to plaintiffs' request for additional time to respond to our clients' Fed.R.Civ.Pro. 12(b)(6) motion. Further, there is no reason for an in-person conference on this matter until defendants' motions are all adjudicated on the merits. Finally and significantly, this firm, on behalf of our clients, has no interest in "discussing the advisability" of mediation proceedings or any alternative dispute resolution as a way of resolving this case.

For these reasons, the Mann defendants object to counsel's request for additional time to respond to defendants' motion and object to counsel's request for a "collegial in-person conference" at this time.

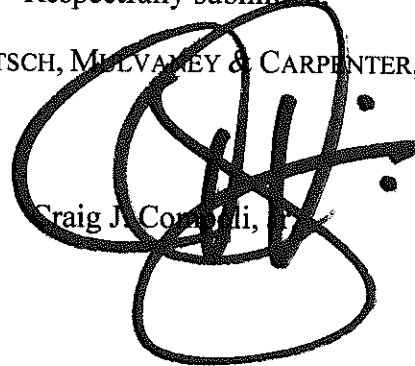
**McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP**  
ATTORNEYS AT LAW

Honorable James B. Clark, III  
February 1, 2016  
Page 2

Thank you.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

A large, stylized handwritten signature in black ink, appearing to read "Craig J. Connelly". The signature is written over the printed name of the signatory.

CJC:lsd

cc: David M. Hoffman, Esq.  
Meredith Kaplan Stoma, Esq.  
Craig L. Steinfeld, Esq.  
Anthony J. Sylvester, Esq.